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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAGINI VECHAM, *et al.*,

Defendants.

Case No.: CR 15-0427 BLF

**JOINT STIPULATION AND [PROPOSED] ORDER
RE STATUS CONFERENCE
AS MODIFIED BY THE COURT**

The United States, through its counsel Assistant United States Attorney Timothy Lucey, and defendant Vecham, through her counsel Nanci Clarence and Josh Cohen, defendant Pallapothu through his counsel Mary McNamara and Edwin Prather, defendant Tota through his counsel Ethan A. Balogh and defendant Reddy through his counsel Izzy Ramsey, hereby agree and stipulate to a continuance in this case from Tuesday, October 18, 2016, to Tuesday, December 13, 2016, at 8:30 a.m. before this Court.

This continuance is requested for the following:

1 Since the last calling of this case, counsel for Kishore Pallapathou have spearheaded
 2 negotiations with the United States in pursuit of global resolution. The parties ordered
 3 professional appraisals on a number of commercial real estate properties, but still await the
 4 completion of those appraisals. Additional time is required to receive the appraisals, consider
 5 and analyze their meaning in the context of a settlement, and further the settlement efforts
 6 between the parties. The parties agree that a continuance until December 13, 2016 is
 7 necessary to advance this matter towards a resolution.

8 For these reasons, the parties respectfully request that the Court continue the status
 9 conference in this case from October 18, 2016 to December 13, 2016, at 8:30 a.m. The
 10 parties stipulate that the time period through December 13, 2016 should be excluded under the
 11 Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv) in the interest of justice to
 12 permit effective defense investigation and preparation, and specifically to allow time for the
 13 defense to evaluate the discovery provided, consider additional investigation and discovery
 14 requests, and make an informed decision regarding the course of the case.

15 SO STIPULATED.

16 BRIAN J. STRETCH
 17 United States Attorney

18 Dated: October 13, 2016

19 _____/s/
 20 TIMOTHY LUCEY
 21 Assistant United States Attorney

22 Dated: October 13, 2016

23 _____/s/
 24 Nanci Clarence
 25 JOSH COHEN
 Attorneys for Defendant
 RAGINI VECHAM

Dated: October 13, 2016

_____/s/_____

MARY MCNAMARA
EDWIN PRATHER
Attorneys for Defendant
KISHORE PALLAPOTHU

Dated: October 13, 2016

_____/s/_____
ETHAN A. BALOGH
Attorney for Defendant
SATYANARAYANA TOTA

Dated: October 13, 2016

_____/s/_____
IZZY RAMSEY
Attorney for Defendant
RAMANA REDDY

[PROPOSED] ORDER

GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED that the status conference scheduled for October 18, 2016 is CONTINUED to December 13, 2016, at 8:30 a.m., before this Court. **If the parties wish to convert the status conference to a change of plea, the matter will be reset for December 13, 2016 at 8:00 a.m.** The Court finds that the ends of justice that will be served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial, and that for the reasons stated in the stipulation, *i.e.*, the need for additional time for effective defense investigation and preparation, and specifically for the defense to evaluate the discovery provided, consider additional investigation and discovery requests, and make an informed decision regarding the course of the case, an exclusion of time is appropriate.

Accordingly, IT IS HEREBY ORDERED that, for the reasons stated in the stipulation, the time within which the trial of this matter must be commenced under the Speedy Trial Act is EXCLUDED during the time period from October 18, 2016, through December 13, 2016,

1 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv), due to the need for additional
2 time to permit effective defense investigation and preparation for the above-stated reasons,
3 and in the interests of justice.

4
5 IT IS SO ORDERED.

6
7 Dated: October 14, 2016


HONORABLE BETH L. FREEMAN
UNITED STATES DISTRICT JUDGE